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**From:** D'Amico, Louis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=78A91F83C4414910BE286EFE02004DBC-D'AMICO, LOUIS J.]  
**Sent:** 2/13/2019 1:58:23 PM  
**To:** Dunlap, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=591eb15a268249dda0c05a7451f765c3-Dunlap, Dav]; Orme-Zavaleta, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c5a111dc377411595e5b24b5d96146b-Orme-Zavaleta, Jennifer]; Maguire, Megan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6a013c79651d4a86afd93dfc45128ebb-maguire, Megan]  
**CC:** Hubbard, Carolyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a93ce3245494318b109e87f7d826284-Hubbard, Carolyn]; Fitzpatrick, Kacey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b91d7852b66540ff9f823f4c736927a1-Fitzpatrick]; Fitzmorris, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4051a5cf28144ee599b7cb3e9c2527bf-Fitzmorris,]; Christian, Megan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64a0f5e0e9d94271b23cad28db653851-Lizotte, Me]  
**Subject:** RE: Chemical Watch Inquiry: CEI IRIS report DDL 8am 2/13

No edits from me.

Louis D'Amico, Ph.D.  
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**From:** Dunlap, David  
**Sent:** Wednesday, February 13, 2019 8:48 AM  
**To:** Orme-Zavaleta, Jennifer <Orme-Zavaleta.Jennifer@epa.gov>; Maguire, Megan <Maguire.Megan@epa.gov>  
**Cc:** Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Fitzpatrick, Kacey <Fitzpatrick.Kacey@epa.gov>; Fitzmorris, Amanda <fitzmorris.amanda@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Christian, Megan <Christian.Megan@epa.gov>  
**Subject:** RE: Chemical Watch Inquiry: CEI IRIS report DDL 8am 2/13

# Deliberative Process / Ex. 5

# Deliberative Process / Ex. 5

# Deliberative Process / Ex. 5

David D. Dunlap

O — Personal Matters / Ex. 6

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**From:** Orme-Zavaleta, Jennifer

**Sent:** Tuesday, February 12, 2019 10:36 PM

**To:** Maguire, Megan <Maguire.Megan@epa.gov>

**Cc:** Dunlap, David <dunlap.david@epa.gov>; Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Fitzpatrick, Kacey <Fitzpatrick.Kacey@epa.gov>; Fitzmorris, Amanda <fitzmorris.amanda@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Christian, Megan <Christian.Megan@epa.gov>

**Subject:** Re: Chemical Watch Inquiry: CEI IRIS report DDL 8am 2/13

Want to make sure david concurs

Jennifer Orme-Zavaleta, PhD

Principal Deputy Assistant Administrator for Science

Office of Research and Development

US EPA

Personal Matters / Ex. 6

On Feb 12, 2019, at 10:24 PM, Maguire, Megan <Maguire.Megan@epa.gov> wrote:

Okay, so add another bullet with that wording?

Sent from my iPhone

On Feb 12, 2019, at 10:14 PM, Orme-Zavaleta, Jennifer <Orme-Zavaleta.Jennifer@epa.gov> wrote:

## Deliberative Process / Ex. 5

Jennifer Orme-Zavaleta, PhD

Principal Deputy Assistant Administrator for Science

Office of Research and Development

US EPA

Personal Matters / Ex. 6

On Feb 12, 2019, at 9:33 PM, Dunlap, David <dunlap.david@epa.gov> wrote:

I'm fine with this.

DDD

David D. Dunlap

O — Personal Matters / Ex. 6

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**From:** Maguire, Megan

**Sent:** Tuesday, February 12, 2019 8:00 PM

**To:** Orme-Zavaleta, Jennifer <[Orme-Zavaleta.Jennifer@epa.gov](mailto:Orme-Zavaleta.Jennifer@epa.gov)>;

Dunlap, David <[dunlap.david@epa.gov](mailto:dunlap.david@epa.gov)>

**Cc:** Hubbard, Carolyn <[Hubbard.Carolyn@epa.gov](mailto:Hubbard.Carolyn@epa.gov)>; Fitzpatrick, Kacey

<[Fitzpatrick.Kacey@epa.gov](mailto:Fitzpatrick.Kacey@epa.gov)>; Fitzmorris, Amanda

<[fitzmorris.amanda@epa.gov](mailto:fitzmorris.amanda@epa.gov)>; D'Amico, Louis

<[DAmico.Louis@epa.gov](mailto:DAmico.Louis@epa.gov)>; Christian, Megan

<[Christian.Megan@epa.gov](mailto:Christian.Megan@epa.gov)>

**Subject:** Chemical Watch Inquiry: CEI IRIS report DDL 8am 2/13

Hi Jennifer and David- we got the below inquiry from Chemical Watch,  
**deadline is 8am tomorrow.**

**Inquiry:**

I was wondering if EPA would like to respond to the Competitive Enterprise Institute [report](#) that published today, "EPA's Flawed IRIS Program is Not the Gold Standard", and the claim that the program "has a long history of sloppy research and lack of transparency that has advanced faulty and often counterproductive regulations that impose needless burdens on the public."

More specifically:

- The report claims that IRIS suffers from "excessive caution", and the agency tends to "focus on preventing worst-case scenarios—even absurd ones—and ignore more plausible scenarios, while ignoring more serious risks created by the EPA's own regulations." Does the agency agree/disagree?
- The report notes that in the 2018 NAS review, EPA got "modest praise for its reforms", but went on to say: "IRIS staff garnered some praise and avoided a critical review by keeping the scope of the NAS review extremely narrow." Would the agency like to address this?
- The report suggests that Mr. Wheeler is considering rolling IRIS into TSCA ("Wheeler would be wise to roll IRIS functions into the

TSCA program, a possibility he seems to be considering." ). Can you confirm the accuracy of this?

- Finally, on the comment that "Procedural reforms are unlikely to address the program's overly cautious culture. Rather, it is time to shut down IRIS, or at the very least give it a massive overhaul" - would EPA like to respond to this conclusion? Does the agency have any planned IRIS reforms on the horizon?

NCEA drafted the following response:

## **Deliberative Process / Ex. 5**

Let us know if you are okay with this response.

Thanks,  
Megan